

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

JANE FIELY,)	Case No. 3:13-cv-02005
)	
Plaintiff,)	Judge Carr
)	Mag. Judge Armstrong
v.)	
)	DEFENDANTS' MOTION FOR
ESSEX HEALTHCARE)	SUMMARY JUDGMENT
CORPORATION and ATRIUM)	
LIVING CENTERS, INC.,)	
)	
Defendants.)	

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and the rules and orders of this Court, Defendants, Essex Healthcare Corporation (“Essex”) and Atrium Living Centers, Inc. (“Atrium”) (collectively, “Defendants”), by counsel, hereby moves for summary judgment on all of Plaintiff, Jane Fiely’s (“Fiely”) claims against them, on the basis that there are no genuine issues of material fact and that Defendants are entitled to summary judgment as a matter of law. In support of this motion, Defendants submit with more particularity, a Brief and supporting evidence contemporaneously herewith. The brief includes a statement of undisputed material facts.

WHEREFORE, and as supported by Defendants’ Brief and Designated Evidence, Defendants request that the Court grant summary judgment in its favor and against Fiely, and for all other just and appropriate relief.

Respectfully submitted,

s/ Brian Garrison

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CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2014, a copy of the foregoing was served by the Court's CM/ECF system. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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